

FILED

DEC 19 2019

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JALEN EXAVIER SIMMS,  
aka "Pac Man,"

Defendant.

No.

**4:19CR01051 HEA/PLC**

**INDICTMENT**

**COUNT I**

The Grand Jury charges that:

On or about June 3, 2019, in the City of St. Louis, within the Eastern District of Missouri,

**JALEN EXAVIER SIMMS**  
**aka "Pac Man,"**

the Defendant herein, aided and abetted by others, with intent to cause death and serious bodily harm, did attempt to take from the person and presence of another, by force, violence, and intimidation, a motor vehicle, that is, a 2012 Dodge Ram truck, VIN #1C6RD7FT7CS283454, that had been transported in interstate commerce, resulting in the death of Jabari Clark.

In violation of Title 18, United States Code, Sections 2119(3) and 2.

**COUNT II**

The Grand Jury further charges that:

On or about June 3, 2019, in the City of St. Louis, within the Eastern District of Missouri,

**JALEN EXAVIER SIMMS**  
**aka "Pac Man,"**

the Defendant herein, aided and abetted by others, did knowingly possess, brandish, and discharge a firearm in furtherance of a crime of violence which may be prosecuted in a court of the United States; to wit: armed carjacking as charged in Count One herein, in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii).

And in the course of this violation, caused the death of Jabari Clark through the use of the firearm, which killing is murder as defined in Title 18, United States Code, Section 1811, in that the defendant, with malice aforethought, unlawfully killed Jabari Clark by shooting him with the firearm willfully, deliberately, maliciously, and with premeditation, thereby making this offense punishable under Title 18, United States Code, Section 924(j)(1).

A TRUE BILL.

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FOREPERSON

JEFFREY B. JENSEN  
United States Attorney

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